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Policies and Rules Concerning
Children's Television Programming

MM Docket No. 93-48

Revision of Programming Policies
for Television Broadcast Stations

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COMMENTS OF

THE WARNER BROS. TELEVISION NETWORK,
WARNER BROS. AND TIME WARNER INC.

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SUMMARY

Because quality educational television has proven to be an effective method of educating and informing the nation's youth,¹ The Warner Bros. Television Network (The "WB"), Warner Bros. and Time Warner Inc. applaud and support the Commission's goal of increasing the amount of educational and informational children's programming that is aired on television.

We urge the Commission, as it considers its regulatory proposals, to be guided in its decision by several overarching principles. First, the educational programs that broadcasters air must be high quality and engaging so that children will watch -- and learn from -- the programs. Second, because the economics of producing and airing educational programming are extraordinarily challenging, as are the economics of launching a new television network, any regulations must be carefully crafted so that any rules nurture, rather than frustrate, the development of both educational programming and new networks. Third, the Commission can encourage different types of educational efforts if it considers all such activities when it evaluates a broadcaster at renewal.

With these guiding principles, we respond to the Commission's specific proposals as follows:

First, we urge the Commission to modify its proposed definition of educational programs to include short segments so that broadcasters are

¹ See, e.g., Lawrie Mifflin, *Study Finds Educational TV Lends Preschoolers Even Greater Advantages*, N.Y. Times, May 31, 1995, at B8.

encouraged to air short educational segments as well as longer programs. To this end, The WB is already helping its affiliates to educate and inform children by producing such short educational segments to air during The WB's children's programming. Even during its first week of broadcasting children's programming, The WB began airing a series of eighteen 60-second interstitial segments (titled "Crazy Careers") to inform children about a variety of jobs and careers, and, in the process, to convey additional information about nutrition, safety and the like. Short segments are especially valuable because they can teach and inform by providing small pieces of information in an entertaining and memorable way. Indeed, many lessons would not work as well for the child targeted audience in longer formats.

Second, we support the Commission's proposal that so long as "a significant purpose" of a program is to educate or inform, it will qualify as an educational program. The entertainment component of such a program need not -- and should not -- be evaluated as primary or secondary, as the Commission had previously proposed. Indeed, such a requirement would undermine the goals of the CTA because children will not watch (and consequently will not learn from) programs that they find academic and dull.

Third, we support facilitating the flow of information to parents through such materials as printed and on-screen program guides as to the times and dates when educational programming will be aired. Armed with such information, parents will be in a better position to encourage their children to watch these

educational shows. We oppose, however, requiring an on-air identification of educational programs at the time such programs are aired. Such an identification would be of little use to parents unless they happen to be watching at the precise moment the identification appears on screen. The identification could, however, discourage many children from watching educational programs if they assume that the programs are boring and unenjoyable and, therefore, change the channel before the programs start.

Finally, we urge the Commission not to ignore non-broadcast educational efforts made by broadcasters in their communities, even if those efforts are unrelated to programming. In assessing a broadcaster's compliance with the CTA, the Commission currently considers only those non-broadcast activities that assist or supplement broadcast material. There are numerous contributions that broadcasters can make, however, to the education of children in their communities. To encourage broadcasters to augment their on-air educational efforts with community-based educational activities, the Commission should consider all these activities in reviewing a broadcaster's overall efforts at renewal.

**COMMENTS OF THE WARNER BROS. TELEVISION NETWORK,
WARNER BROS. AND TIME WARNER INC.**

The WB, Warner Bros. and Time Warner submit these Comments to respond to some of the specific proposals raised in the Notice of Proposed Rulemaking ("NPRM") released by the Commission on April 7, 1995 in this proceeding.

INTRODUCTION

Because The WB, Warner Bros. and Time Warner support the underlying goal of the Children's Television Act (the "CTA") to increase the availability of educational and informational children's programming on television, we join together to file these Comments. We recognize, of course, that each of us has a particular role to play in the educational process of the nation's children. We start with The WB.

The WB is an emerging network that made its network television debut on January 11, 1995, with two hours of prime time programming.² This fall, The WB launched *Kids' WB*, a block of children's programs on Saturday mornings and a weekday children's program. The WB also added a second night of prime time programming to its network feed. The WB is part of the corporate family of Time Warner, which is one of the world's

² The WB is a partnership, one of whose general partners is Warner Bros. Communications, a division of Time Warner Entertainment Company, L.P.

leading media and entertainment companies,³ and Warner Bros., a successful producer of television programs.⁴

As a nascent network attempting to establish strong, long-term relationships with its affiliates, The WB is very interested in finding appropriate ways to help its affiliates satisfy their CTA requirements. To this end, The WB has already assumed responsibility for producing and airing the eighteen “Crazy Careers” short segments described in more detail below. Nonetheless, The WB is in its infancy and must be afforded an opportunity to grow. Having launched the network less than one year ago and its children’s programs *only last month*, The WB still stands on precarious ground. At this fragile juncture in The WB’s status as a network, The WB is necessarily limited in the efforts it can currently undertake to program educational children’s shows.⁵ Indeed, with start-up costs in the \$300 million range and estimates that it will take four years before any profit is earned,⁶ The WB must watch its expenditures closely. Simply put, The WB does not yet have the economic ability or level of viewership to air as much educational programming as it would like.

Because of basic differences between established and new networks, the established networks can serve their affiliates’ need for educational children’s fare in ways that are

³ Time Warner’s interests include magazine and book publishing, recorded music and music publishing, filmed entertainment, theme parks, cable television and cable television programming, and the newly launched Warner Bros. Television Network. As explained below, Time Warner also is in the process of acquiring Turner Broadcasting System, Inc. (To this end, an application will be filed with the Commission shortly).

⁴ Warner Bros. is a division of Time Warner Entertainment Company, L.P.

⁵ All references in these Comments to “educational” programs should be understood to be a shorthand reference to both “educational and informational” programs.

⁶ David Tobenkin, *New Players Get Ready to Roll: UPN and WB Prepare to Take Their Shots*, Broadcasting & Cable, Jan. 2, 1995, at 30.

currently impossible for The WB. The existing networks have established, over time, a strong distribution system with the coverage of powerful stations. The WB's distribution system, by contrast, is necessarily composed primarily of weaker UHF stations. It has relatively few VHF station affiliates. The WB's lack of a powerful distribution system translates into smaller audiences and lower ratings, all of which make the financing of programming much more risky for The WB than for the established networks. Simply stated, in order to compete The WB must pay established network prices for its programs, but it is not earning revenues anywhere close to those of the established networks. It is important to emphasize in this regard that although The WB is part of the Time Warner family, The WB must stand or fall on its own merits and finances.

While The WB has recently increased its network feed from two to thirteen hours per week, this is still a small amount when compared to the approximately 90 hours per week that ABC, CBS and NBC each air. When the problematic economics of producing and airing educational children's programs are combined with the equally challenging economics of launching a new network, the immutable result is that The WB cannot afford to include "substantial length" educational programming in its network line-up at this time. While The WB is committed to do so as soon as it is economically feasible, it would both disserve the public interest and be counter to the goal of the CTA if pressure to air educational children's programming prematurely contributed to the demise of this new network.

This is not to say, however, that The WB is currently ignoring the cognitive and educational needs of children. To the contrary, The WB is making efforts even as a nascent

network to address these needs. For example, The WB's standard-length children's programs are all high-quality programs with developed storylines. The programs frequently incorporate morals and lessons and often deal with social and health issues that children face everyday. Indeed, some of the programs include segments that have education as a significant purpose.

Storylines for *Animaniacs* and *Pinky and The Brain*, for example, are often adapted from classical literature or history. Two segments of *Animaniacs* introduce children to the works of Shakespeare by having a character read lines from *Macbeth* and *A Midsummer Night's Dream*, while another character translates the lines into modern English. *Animaniacs* has also included adaptations of *Moby Dick* and H.G. Wells' *Time Machine*. Other segments retell the stories of historical characters, with the Animaniacs traveling through time to witness and participate in such events as Michelangelo's painting of the Sistine Chapel, Abraham Lincoln's drafting of the Gettysburg Address, and Beethoven's composition of his Fifth Symphony. *Animaniacs* segments also portray life during different historical periods. In one segment, the Animaniacs go to Woodstock and explain the cultural and historical context of the 1960s. In another segment, they assist a family in its flight from Poland and the Nazis during World War II.

The *Animaniacs* and *Pinky and The Brain* characters also provide basic introductions to modern scientific principles, for example, by helping Einstein to develop his theory of relativity and participating in Pavlov's reflex action experiments. A particularly memorable episode of *Pinky and The Brain* takes a tour of the human brain, explaining the parts and their functions en route. The characters also teach through song. In one song, for example, the Animaniacs jump around to point out dozens of the nations of the world on a large map.

In another, they name all the U.S. Presidents. In another, they name the capitals of the 50 U.S. states -- a segment that numerous teachers have used in their classrooms. Other segments have included lessons on nutrition, while still others have exposed children to foreign languages. In one segment, for example, the *Animaniacs* sing about the different ways to say "hello" around the world. Another segment of *Animaniacs* is performed entirely in French (with English subtitles). As these examples demonstrate, The WB is already airing programs that contain educational and informational segments.⁷

We next turn to Warner Bros. As a producer of quality programs, Warner Bros. has always taken seriously its social responsibility as a program provider and has a long tradition of producing socially responsible programming that is heavily laden with educational value. For example, Warner Bros.' recently expanded animation division, in conjunction with others such as Steven Spielberg, produced the highly acclaimed and award-winning program *Animaniacs* described above. The numerous awards that *Animaniacs* has won include the Peabody Award, the Parent's Choice Award, the Environmental Media Award and multiple Emmy Awards.⁸

Warner Bros.' prime time family shows (*Full House*, *Family Matters*, *Step by Step*, *Hangin' With Mr. Cooper* and *The Parent 'Hood*) have often been lauded by educational and advocacy groups for their sensitive and meaningful portrayals of such topics as teenage

⁷ We emphasize, however, that while segments of these programs clearly have education as a significant purpose, we have not characterized these programs as a whole as "specifically designed to meet the educational and informational needs of children," and we are not doing so here.

⁸ The annual George Foster Peabody Broadcasting Award is presented for outstanding service in broadcasting. The Parents' Choice Award identifies choice materials for children of all ages and of diverse skills and backgrounds. The Environmental Media Awards honor television, film and music productions that promote environmental issues.

alcohol abuse, eating disorders, guns in schools, homelessness, self-esteem, sexual abstinence, effects of tragedies and disasters on children, the importance of family, volunteerism, dyslexia, staying in school, and inner-city race relations. The Warner Bros.' series *Life Goes On* was the first series to star an actor with Down's syndrome. Through these prime time entertainment series, Warner Bros. has contributed to educating and informing the nation's youth.

Finally, Time Warner has long had as part of its corporate culture a commitment to contributing to the education of America's children. This commitment is manifested at both the corporate level (Time Warner's Time to Read program, for example, is the largest and most successful corporate-sponsored volunteer literacy program in the country) and at the divisional level (Time Inc., for example, publishes *Time For Kids*, a weekly news magazine for 4th, 5th and 6th graders; Time Warner Cable has wired 85 percent of the schools in its service areas for cable). Moreover, if the Commission grants Time Warner's application to acquire control of WTBS,⁹ Time Warner will demonstrate the same commitment in Atlanta that it has already shown in its cable communities and nationwide to support our schools' educational efforts, as described more fully below. In addition, Time Warner is committed to maintaining the high level of quality educational programming that is already aired on WTBS, which includes such programs as *Feed Your Mind* (a children's version of CNN) and *The New Adventures of Captain Planet* (an animated program that addresses environmental issues).

⁹ Time Warner does not want to be presumptuous or appear to prejudge the outcome of that application. At the same time, Time Warner also does not want to sit out a proceeding on such an important issue as educational children's programming. Time Warner therefore joins in this filing with The WB and Warner Bros., even though Time Warner does not hold any broadcast licenses at this time.

With this background on both our educational commitment and efforts to date, as well as The WB's fragile economic status as a newly emerging network, we turn to some of the specifics of the Commission's proposals.

I. SHORT SEGMENTS HAVE UNIQUE VALUE AND SHOULD BE INCLUDED IN THE COMMISSION'S DEFINITION OF EDUCATIONAL PROGRAMMING

The Commission's proposed definition of core educational programming currently includes only programming of "substantial length (*e.g.*, 15 or 30 minutes)."¹⁰ By arbitrarily excluding short segments from the definition, the Commission would be discouraging the airing of such programming and, thereby, diserving the goal of the CTA to "increase the amount of educational and informational broadcast television programming for children."¹¹ There is no doubt that 15 and 30-minute educational programs can be educationally valuable. Short segments, however, have their own unique ability to convey information efficiently and effectively. Unless the Commission also considers this programming in evaluating a broadcaster's overall efforts, it will be giving broadcasters a disincentive to air such segments.

Consider, for example, the *Schoolhouse Rock* series of three-minute segments that were aired by the ABC network for more than ten years during its Saturday morning children's programming block. A generation of children watched animated characters sing about topics ranging from grammar ("a noun is a person, place or thing . . .") to history

¹⁰ *Policies and Rules Concerning Children's Television Programming*, 10 FCC Rcd 6308 (1995) ("NPRM") at 6327, 6330.

¹¹ Children's Television Act of 1989, Senate Committee on Commerce, Science and Transportation, S. Rep. No. 227, 101st Cong., 1st Sess. 1, 9 (1989).

("the shot heard 'round the world, was the start of the revolution. . . ."); in the process, they learned valuable lessons and information.¹² Recently, in response to viewer requests, ABC returned the *Schoolhouse Rock* series to its Saturday morning children's line-up and ordered new segments, so that a whole new generation could be educated by these highly successful short segments.¹³

Many of these lessons would not work as well for the child targeted audience in longer formats. Indeed, it is precisely for this reason that educational programming of longer length is often composed of many short segments. For example, one of the most successful children's educational television programs of all time, *Sesame Street*, consists primarily of self-contained short segments educating children on discrete topics such as letters of the alphabet and numbers. In one segment, for example, Ernie and Bert might be discussing the letter "E"; in the next segment, the Count might be counting to 10.

For new networks, short segments can be a particularly valuable tool for adding educational elements to a children's block of programming. As explained above, at a time when The WB is just trying to establish itself and begin to earn a profit (let alone break even), The WB is not yet in a position to air "substantial length" educational children's programming over its network. Short segments, although hardly an incidental financial investment, are more feasible in the short term.

The WB has already produced 18 educational and informational 60-second segments, in a series entitled "Crazy Careers." These segments, which began airing the first week that

¹² Sally Streff Buzbee, *For Generation X, Remember "Conjunction Junction?"* Associated Press, July 17, 1995, at 2.

¹³ *Id.*

Kids' WB was launched, cost an average of \$12,000 each, for a total of \$216,000 to date.

Perhaps the best way to describe the "Crazy Careers" segments is to use the words of the Animaniacs, the characters who introduce each "Crazy Careers" segment by singing, "The WB presents a person you might want to be." Set to song while narrated by one or a combination of the Animaniacs, Pinky and The Brain, Michigan J. Frog, or a Looney Tunes character, each segment then describes a particular career or job. The jobs range from veterinarian, to NASA pilot, to tugboat captain, to elevator repairman. Each segment includes an interview with someone holding that job in which the interviewee talks about his or her work and what he or she likes about it. In addition, information and lessons are included by the animated narrators or interviewees. In the segment on a paint manufacturer, for example, we learn about mixing colors. In the segment interviewing someone who makes dentures, we learn about caring for teeth (to avoid the need for dentures, of course).

Short segments like these have been received eagerly by both The WB affiliates and viewers. Because the educational value of these segments is best demonstrated by the segments themselves, a videotape with the "Crazy Careers" segments is enclosed with these Comments. We urge the Commission to support and encourage this type of innovative educational programming and not to erect unnecessary regulations that will diminish a broadcaster's incentive to air short segment educational programming. Specifically, we urge the Commission to modify its definition of educational programming so that short segments are included.

II. THE COMMISSION SHOULD ADOPT ITS PROPOSED "SIGNIFICANT PURPOSE" TEST

Studies continue to show, and parents confirm, that quality educational television programs are a valuable tool for helping children learn.¹⁴ Children cannot, however, learn from educational television programs unless they watch those programs. The ratings of children's programs demonstrate that children (like most adults) are overwhelmingly drawn to entertaining programming.¹⁵ The Commission has thus appropriately proposed to define programs that are "specifically designed to meet the educational and informational needs of children" as programs that have education as "a significant purpose," -- *i.e.*, more than an incidental goal but not necessarily the primary purpose.¹⁶

Today's children are discerning consumers who hold firm likes and dislikes. There are too many other interesting and entertaining choices, such as cable TV, VCRs, video games, and computers, to name just a few, for children to watch a program simply because it is on over-the-air television.¹⁷ If educational television programs are not sufficiently "attractive to children" to gain and hold their attention,¹⁸ children simply will not watch.

¹⁴ Lawrie Mifflin, *Study Finds Educational TV Lends Preschoolers Even Greater Advantages*, N.Y. Times, May 31, 1995 at B8; Don Oldenburg, *Tuning In the Future of Kids' TV*, The Washington Post, Sept. 12, 1995, at B5.

¹⁵ The WB, as a new entrant to the children's television programming market, is acutely aware of the battle for ratings in this highly competitive market. Historically, as is the case today, entertainment programs have garnered the highest ratings among children's shows.

¹⁶ NPRM at 6327-28.

¹⁷ David Tobenkin, *New Blocks Put Squeeze on Kids Syndication*, Broadcasting & Cable, July 24, 1995, at 38.

¹⁸ NPRM at 6328.

The “significant purpose” test proposed by the Commission moves in the right direction toward achieving this goal.

The educational and informational segments that The WB and Warner Bros. have produced -- both the stand-alone “Crazy Careers” segments and the segments scattered throughout programs like *Animaniacs* and *Pinky and The Brain* -- are designed to educate and inform children *while they entertain*. The WB’s decision to include “substantial length” educational programs in its network line-up in addition to educational segments will, by necessity, come when it has greater economic stability. If educational children’s programs are ever to be economically feasible for an emerging network, they must also attract viewers, which means they must be entertaining. Because it is critical, therefore, that programs that are both educational (or informational) *and* entertaining be considered in evaluating a broadcaster’s compliance with its obligation to air educational programming, we support a definition that includes all programs that have, as “a significant purpose,” to educate or inform.

III. THE COMMISSION SHOULD NOT REQUIRE AN ON-AIR IDENTIFICATION OF EDUCATIONAL PROGRAMS

The Commission’s goal of providing information about children’s educational programming to the public, especially parents, so that the Commission need not be in the business of evaluating the quality of children’s programming, is laudable.¹⁹ To further this goal, the Commission has proposed requiring stations to provide information to publishers of program guides, which in turn can identify educational programs in their guides. The

¹⁹ *Id.* at 6321.

Commission has also proposed requiring stations to identify educational programs as such on-air, at the time such programs are aired.²⁰

We support publishing information to identify educational children's programming. However, we urge the Commission not to require an on-air identification. In the NPRM, the Commission aptly recognized that if parents are informed "in advance" when educational programs will be available, they will be afforded the opportunity to encourage their children to watch such programs.²¹ The best and most practical way to accomplish that objective is to require broadcasters to provide identifying information to program guide publishers, including on-screen program guides.²² Armed with information about the educational fare offered on television, parents can then set about arranging for their children to watch those programs.²³

In addition, identification of educational programs in program guides can also have the residual benefit, as recognized by the Commission, of increasing audiences and ratings for educational programming and thereby increasing broadcasters' incentives to air such

²⁰ *Id.* at 6322.

²¹ *Id.* at 6321.

²² On-screen program guides are becoming increasingly user friendly and interactive. According to the providers of one such service, planned features "include being able to view 'video clips on demand' directly off the program guide, which will give viewers more information about TV programs plus 30-second promotion clips." Mark Berniker, *TCI Plans to Merge Prevue, TV Guide On Screen*, *Broadcasting & Cable*, Oct. 16, 1995, at 54.

²³ To provide the maximum amount of information to parents, producers should specify whether programs are educational as a whole or whether segments are educational. For the latter, producers should identify those episodes that contain the educational segments. For example, Warner Bros. would not identify all episodes of *Animaniacs* as educational, but would specify that the particular episodes containing segments like those described above contain educational segments.

programming.²⁴ As an emerging network striving to establish a substantial and loyal audience, The WB strongly supports any efforts by the Commission that would assist in achieving that end.

By contrast, an *on-air* identification, either by words or an icon, is unlikely to fulfill the Commission's goal and, indeed, will more likely work to the contrary.²⁵ It is unlikely that parents will even see (or benefit from) an *on-air* identification unless they happen to be watching a program at the precise moment the identification appears on the screen. The more likely viewers of an *on-air* identification of educational programs are children. But, as any parent knows, children often reject by what is deemed by others to be in their best interest. Accordingly, an *on-air* identification of educational programs may actually discourage, rather than encourage, children from watching those programs, in the same way that children run from spinach, the dentist and, in many cases, the classroom. An *on-air* label, either through words or an icon, could thus actually prove counterproductive to the CTA's goal of having children watch and learn from educational programs.

On-air labeling may also unwittingly cause difficulties for new networks that are trying to establish an audience base for their children's programs. Even more so than other networks, as an incipient network The WB has an acute interest in ensuring, whenever possible, that viewers "don't touch that dial" when they are watching the network's line-up. An *on-air* icon or warning that a program is educational could, unfortunately, have precisely the opposite effect as children turn to another children's program that has no icon and,

²⁴ NPRM at 6321.

²⁵ The use of an icon identifying educational programs will have the same deterrent effect as a more explicit label because children will quickly learn what the icon means.

therefore, is presumed (rightly or wrongly) to be more likely to entertain the child.

Requiring an on-air identification will thus provide only a disincentive for networks -- particularly nascent ones -- to include such worthwhile, but financially risky, programming.

To avoid these unintended and unfortunate consequences, while still furthering the goal of conveying information about educational children's television programs to parents, the Commission should require that information about educational programming be provided to publishers of written and on-screen program guides. The Commission should refrain, however, from requiring an on-air identification on the broadcast program itself that is likely to be counterproductive to the Commission's goal.

IV. THE COMMISSION SHOULD ENCOURAGE BROADCASTERS TO AUGMENT THEIR ON-AIR EDUCATIONAL PROGRAMMING WITH NON-BROADCAST EDUCATIONAL EFFORTS

Enhancing the learning environment of America's children has long been part of the Time Warner corporate culture and history. Airing educational programming is unquestionably a significant contribution to achieving that goal. Our nation's schools face many challenges, and there is much that all corporate citizens can do to help schools meet those challenges. It is Time Warner's firm belief that every broadcaster, like every cable operator and other multichannel video program provider, is an important part of the local community and, as such, can and should make a significant contribution to educating the nation's youth -- both on and off the air.

Time Warner has contributed such efforts on both a national and local level. Time Warner's Time to Read program, for example, is the largest and most successful corporate-sponsored volunteer literacy program in America. Time Warner Cable ("TWC") provides

elementary and secondary schools in the communities that it serves with free access to its cable systems. Currently, 85 percent of the schools in those areas are served. TWC will wire 100 percent of the public schools in the near future. In addition, as the Commission is aware, Time Warner has recently agreed to provide schools with free access and free modems to a Time Inc./Time Warner Cable on-line service when that service is offered in its local franchise areas. If the Commission grants Time Warner's application to acquire WTBS, Time Warner will focus its educational efforts on the Atlanta community as well.²⁶

The Commission can encourage both on *and* off-air educational efforts if it considers them both when it evaluates a broadcaster's overall efforts at renewal. Currently, however,

²⁶ We note that WTBS already airs an amount of educational children's programming well in excess of most stations. Time Warner is committed to maintaining the high level of quality educational programming that is aired on WTBS.

the Commission proposes to continue to consider only those “non-broadcast activities that assist or supplement *broadcast* material.”²⁷ We do not propose that a broadcaster be permitted to satisfy its CTA obligation through non-broadcast efforts alone. Nor do we propose that non-broadcast activities be weighted as heavily as a broadcaster’s educational children’s programming. After all, programming is what broadcasters do best. Nonetheless, it is a mistake, in our view, to ignore the valuable contribution that non-broadcasting activities, such as the ones enumerated above, make to the education of children. We urge the Commission to modify its rule so that it considers and thereby encourages *all* educational efforts, both on and off the air.

²⁷ *Policies and Rules Concerning Children’s Television Programming*, 8 FCC Rcd 1841, 1842 n.13 (1993) (emphasis supplied).

CONCLUSION

For the reasons set forth above, we urge the Commission to (1) define educational and informational programming in a manner that includes short segments; (2) adopt the proposed "significant purpose" test, so that entertainment will be an equally significant purpose of educational programming; (3) not require that educational programs be so identified on air, but instead require that such programs be identified to program publishers, and (4) consider all educational efforts in determining whether a broadcaster has satisfied its CTA obligation.

Respectfully submitted,



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